

## **EXHIBIT A**

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF GEORGETOWN	)	CIVIL ACTION NO.: 2024-CP-22-
 Jamie Wilson Drescher,		)
		)
Plaintiff,		)
		)
vs.		)
		)
Sodexo Operations, LLC		)
		)
Defendant.		)
		)

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**TO: THE DEFENDANT ABOVE-NAMED:**

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your answer to the said Complaint on the subscriber or subscribers at her or their office at Suite 209, The Courtyard, 1500 U.S. Highway 17 North, Surfside Beach, South Carolina 29587, within thirty (30) days after the service hereof; exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid; the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint and judgment by default will be rendered against you for the relief demanded in the Complaint.

KELAHER, CONNELL & CONNOR, P.C.

s/Lisa Poe Davis

Lisa Poe Davis  
 S.C. Bar No.: 15251  
 Suite 209, The Courtyard  
 1500 U.S. Highway 17 North  
 P.O. Drawer 14547  
 Surfside Beach, SC 29587-4547  
 (843) 238-5648  
[ldavis@classactlaw.net](mailto:ldavis@classactlaw.net)  
 Attorney for Plaintiff

December 27, 2023  
 Surfside Beach, South Carolina

<b>STATE OF SOUTH CAROLINA</b>	<b>)</b>	<b>IN THE COURT OF COMMON PLEAS</b>
	<b>)</b>	<b>FIFTEENTH JUDICIAL CIRCUIT</b>
<b>COUNTY OF GEORGETOWN</b>	<b>)</b>	<b>CIVIL ACTION NO.: 2024-CP-22-</b>
 <b>Jamie Wilson Drescher,</b>		<b>)</b>
		<b>)</b>
<b>Plaintiff,</b>		<b>)</b>
		<b>)</b>
<b>vs.</b>	<b>)</b>	<b>COMPLAINT</b>
	<b>)</b>	<b>(Slip and Fall)</b>
<b>Sodexo Operations, LLC,</b>	<b>)</b>	<b>(Jury Trial Demanded)</b>
<b>Defendant.</b>		<b>)</b>
		<b>)</b>

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The Plaintiff, complaining of the Defendant herein, would show and allege unto this Honorable Court as follows:

1. The Plaintiff is a citizen and resident of Georgetown County, South Carolina.
2. The Plaintiff is informed and believes that the Sodexo Operations, LLC is a corporation organized and existing pursuant to the laws of the State of Delaware and doing business in Georgetown County, South Carolina, providing janitorial services for Waccamaw Community Hospital.
3. On March 22, 2021, Plaintiff was employed by Millenia Medical Services, Inc. to provide medical services to Waccamaw Community Hospital. The Defendant provided staffing for janitorial services to that hospital.
4. On or about March 22, 2021, unknown to the Plaintiff, an agent and/or employee of the Defendant had mopped and left a puddle of water in the area where the Plaintiff was working without providing notice that the area had been mopped. As a result of the negligence of the agent and/or employee of the Defendant the Plaintiff slipped and fell.
5. As a result of the incident, the Plaintiff was seriously and severely injured.

6. The Plaintiff is informed and believes that the Defendant, by and through its agents and/or employees, was negligent, grossly negligent, willful and wanton in one or more of the following particulars:

- a. In mopping in a high traffic area without providing notice to those working in this area;
- b. In causing and permitting the area to be hazardous and unsafe;
- c. In failing to warn the Plaintiff of the dangerous and/or hazardous condition when it knew, or should have known, of the dangerous and/or hazardous condition;
- d. In failing to provide any signs or warning signs to the Plaintiff of the dangerous and/or hazardous condition;
- e. In failing to place signs in a conspicuous manner and in a conspicuous place to warn the Plaintiff of the dangerous and/or hazardous condition existing;
- f. In failing to notify the Plaintiff through its agents and/or employees of the dangerous and/or hazardous condition existing;
- g. In failing to use that degree of skill and care that an ordinary and reasonable person would have done under similar and like circumstances.

10. As a direct and proximate result of the negligence of the Defendants, by and through their agents and/or employees, the Plaintiff has suffered painful and permanent injuries; has incurred and will continue to incur medical expenses; has suffered and will continue to suffer pain and discomfort; has suffered and will continue to suffer loss of wages and earning capacity; has suffered and will continue to suffer a disruption to her daily routine both at home and at work; and has suffered and will continue to suffer a loss of enjoyment of life.

WHEREFORE, the Plaintiff prays for judgment against the Defendants, jointly and severally, for actual damages, for punitive damages, for the costs of this action and for such other and further relief as this Court may deem necessary, just and proper.

KELAHER, CONNELL & CONNOR, P.C.

*s/Lisa Poe Davis*

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Lisa Poe Davis  
S.C. Bar No.: 15251  
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Attorney for Plaintiff

January 9, 2024  
Surfside Beach, South Carolina

AFFIDAVIT OF SERVICE

State of South Carolina

County of Georgetown

Common Pleas Court

Jamie Wilson Drescher, et al, Plaintiff(s)

vs.

Case No: 2024CP2200018

Sodexo Operations, LLC, et al, Defendant(s)

For:

KELAHER, CONNELL &amp; CONNOR, P.C.

P.O. Drawer 14547

Surfside Beach, SC 29587

To be served on: Sodexo Operations, LLC

Lester L. Franzen , undersigned, being duly sworn, deposes and says:

that on January 10, 2024 at 4:37 pm at 6650 Rivers Ave., North Charleston, SC

the undersigned served the documents described as:

Summons and Complaint

A true and correct copy of the aforesaid document(s) was served on:

Sodexo Operations, LLC

By delivering them into the hands of an officer or managing agent whose name and title is

Amy Overcash, Authorized Representative

The person receiving documents is described as follows:

Sex	<u>F</u>	;	Race	<u>White</u>	;	Hair Color	<u>Blonde</u>	;	Facial Hair	<u>N/A</u>
Approx. Age	<u>55</u>	;	Approx. Height	<u>5'05"</u>	;	Approx. Weight	<u>150</u>			

To the best of my knowledge and belief, said defendant was not engaged in the US Military at the time of service.

Subscribed and sworn to before me this

11 day of January, 2024I certify that I am over the age of 18, have no interest in the above action.  
Undersigned declares under penalty of perjury that the foregoing is true and correct.


Lester L. Franzen

SPP File: 138648-1

Process Server  
Southern Pride Process, LLC  
(803) 386-8559  
P.O. Box 7125  
Columbia, SC 29202-7125

Client File:

NOTARY PUBLIC

My Commission Expires: 10-30-2033

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTIES OF HORRY AND ) FIFTEENTH JUDICIAL CIRCUIT  
AND GEORGETOWN )  
  
IN RE: ) ORDER OF PROTECTION  
LISA POE DAVIS, )  
Attorney at Law )  
)

**IT APPEARING** that Lisa Poe Davis, Attorney at law, has requested an Order of Protection for the following dates: May 24, 2024, December 9, 2024 thru December 12, 2024, due to plans to be out of the state during this period of time.

It further appears that the protection that Ms. Davis is requesting should be granted, for good cause shown, an Order protecting her from all appearances in all court proceedings on the following dates: May 24, 2024, December 9, 2024 thru December 12, 2024 in the Court of Common Pleas of the Fifteenth Judicial Circuit.

It is therefore

**ORDERED** that Lisa Poe Davis, be and is hereby granted protection from all court appearances in the Court of Common Pleas of the Fifteenth Judicial Circuit on May 24, 2024, December 9, 2024 thru December 12, 2024.

**IT IS FURTHER ORDERED**, that the Attorney at law referenced herein shall provide notice of this Order of Protection to all counsel of record, and any pro se parties appearing in any cases that this attorney has pending before the Court.

## IT IS SO ORDERED.

Date: \_\_\_\_\_

Honorable William H. Seals, Jr.  
*Chief Administrative Judge*  
*Court of Common Pleas*  
*Fifteenth Judicial Circuit*



Georgetown Common Pleas

**Case Caption:** Jamie Wilson Drescher VS Sodexo Operations Llc

**Case Number:** 2024CP2200018

**Type:** Order/Protection from Court Appearance

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Electronically signed on 2024-01-22 08:58:58 page 2 of 2

Lisa Poe Davis - #15251		
Order of Protection - 5/24/24, 12/9/24-12/12/24		
<b>HORRY COUNTY</b>		
SC Farm Bureau vs. Michael Todd Miller	2021CP2602864	Horry
Peggy Deschamps vs. Roper St. Francis	2021CP2604849	Horry
Oscar Guzman vs. Palmetto Preschool	2023CP2600754	Horry
Soutlantic Services, LLC vs. Sullee Enterprises, Inc.	2023CP2604029	Horry
<b>GEORGETOWN COUNTY</b>		
Jamie Drescher vs. Sodexo Operations, LLC	2024CP2200018	Georgetown